

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL WISNEFSKI)	
)	
Plaintiff,)	Case No. 1:23-cv-04984
)	
v.)	District Judge Ellis
)	
MICKEY GROUP INC., ALEX RABENS,)	Magistrate Judge Kim
And HAMPTOM LUMBER)	
)	
Defendant.)	

**MOTION FOR LEAVE TO FILE AMENDED COMPLAINT
AND TO ENLARGE TIME TO ANSWER OR OTHERWISE PLEAD
TO AFFIRMATIVE DEFENSES**

NOW COMES Plaintiff, MICHAEL WISNEFSKI, by and through his attorneys, GALARNYK & ASSOCIATES, LTD., and respectfully moves for leave to file amended complaint and to enlarge time to answer or otherwise plead to affirmative defenses. Counsel has consulted and agree on this relief.

Respectfully submitted, DEFENDANT,
MICHAEL WISNEFSKI

By: /s/John D. Galarnyk, Esq.
One of His Attorneys

Firm No. 27751
John D. Galarnyk, Esq.
Andrew J. Cunniff, Esq.
John A. Romanucci, Esq.
GALARNYK & ASSOCIATES, LTD.
55 W. Monroe Street, Suite 3600
Chicago, IL 60603
Phone: 312-441-5800; Fax: 312-441-5801
Email: john@galarnykltd.com
Email: andrew@galarnykltd.com
Email: johnr@galarnykltd.com

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And HAMPTON LUMBER)	
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Defendant.)	

NOTICE OF MOTION

TO: Benjamin S. Morrell, Esq.
TAFT STETTINIUS & HOLLISTER LLP.
111 East Wacker Drive, Suite 2600
Chicago, IL 60601
bmorrell@taftlaw.com

PLEASE TAKE NOTICE that on September 6, 2023, at 9:45 a.m., we shall appear before Judge Sara L. Ellis or any judge sitting in her stead of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn, Chicago, Illinois 60604 via Phone Conference (meeting information provided below), and present Plaintiff's **MOTION FOR LEAVE TO FILE AMENDED COMPLAINT AND TO ENLARGE TIME TO ANSWER OR OTHERWISE PLEAD TO AFFIRMATIVE DEFENSES**, a copy of which has been served upon you herewith.

Toll-Free Number: (866) 434-5269
Access Code: 8087837

Respectfully Submitted,
Plaintiff, MICHAEL WISNEFSKI

By: /s/ John D. Galarnyk, Esq.
One of His Attorneys

John D. Galarnyk, Esq. #6191543
Andrew J. Cunniff, Esq. #6308820
John A. Romanucci, Esq. #6333257
GALARNYK & ASSOCIATES, LTD.
55 W. Monroe Street, Suite 3600
Chicago, Illinois 60603
Phone: 312-441-5800
Email: john@galarnyklt.com
Email: andrew@galarnyklt.com
Email: johnr@galarnyklt.com

CERTIFICATE OF SERVICE

TO: Benjamin S. Morrell, Esq.
TAFT STETTINIUS & HOLLISTER LLP.
111 East Wacker Drive, Suite 2600
Chicago, IL 60601
bmorrell@taftlaw.com

The undersigned, an attorney, certifies that a true and correct copy of the **MOTION FOR LEAVE TO FILE AMENDED COMPLAINT AND TO ENLARGE TIME TO ANSWER OR OTHERWISE PLEAD TO AFFIRMATIVE DEFENSES** was served on August 28, 2023, via email at the email address listed on the attached service list before 5:00 p.m.

By: /s/John D. Galarnyk, Esq.
One of His Attorneys

John D. Galarnyk, Esq. #6191543
Andrew J. Cunniff, Esq. #6308820
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GALARNYK & ASSOCIATES, LTD.
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